

1 I. NEEL CHATTERJEE (STATE BAR NO. 173985)
nchatterjee@orrick.com
2 ZHENG (JEN) LIU (STATE BAR NO. 229311)
jenliu@orrick.com
3 RANDY WU (STATE BAR NO. 293090)
rwu@orrick.com
4 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
5 Menlo Park, California 94025
Telephone: +1-650-614-7400
6 Facsimile: +1-650-614-7401

7 Attorneys for Plaintiff
LOGITECH EUROPE S.A.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

12 LOGITECH EUROPE S.A.,
13 Plaintiff,
14 v.
15 ACROX TECHNOLOGIES CO., LTD.,
16 Defendant.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Judge:

Date Action Filed: April 9, 2015

1 Plaintiff Logitech Europe S.A. (“Logitech”), by and through its undersigned counsel, and
 2 for its Complaint against defendant Acrox Technologies Co. Ltd. (“Acrox”), states as follows:

3 **NATURE OF THE ACTION**

4 This Complaint seeks judgment that Acrox has infringed and continues to infringe
 5 Logitech’s U.S. Patent No. 7,030,857 (“the ‘857 patent”), which relates to electronic devices such
 6 as mice. A true and accurate copy of the ‘857 patent is attached hereto as Exhibit A.

7 **THE PARTIES**

8 1. Plaintiff Logitech Europe S.A. is a corporation organized and existing under the
 9 laws of Switzerland with a principal place of business at Rue du Sablon 2-4, CH-1110 Morges,
 10 Switzerland.

11 2. Logitech Europe S.A. is related to its United States counterpart Logitech Inc.,
 12 which is a corporation operating and existing under the laws of the state of California. Logitech
 13 Europe S.A. and Logitech Inc. are each wholly-owned subsidiaries of Logitech International S.A.

14 3. Upon information and belief, defendant Acrox Technologies Co. Ltd. is a
 15 corporation organized under the laws of Taiwan with its principal place of business at 4F, No.89,
 16 Minshan St., Neihu Dist., Taipei 114, Taiwan, R.O.C.

17 **JURISDICTION AND VENUE**

18 4. This is an action for patent infringement arising under the Patent Laws of the
 19 United States, 35 U.S.C. § 1 *et seq.*

20 5. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and
 21 1338(a), and under Title 35 of the United States Code.

22 6. Acrox is subject to personal jurisdiction in this district arising out of its purposeful
 23 acts and/or transactions directed toward this district. Such contacts include, without limitation,
 24 Acrox’s assertion of infringement claims in this District and, on information and belief, Acrox’s
 25 importation of infringing products into California with the intention and expectation that these
 26 infringing products be sold in this District. Upon information and belief, Acrox derives
 27 substantial revenue from infringing products sold to individuals in this District. Accordingly,
 28 Acrox has purposefully availed itself of the privileges and benefits of conducting business in

1 California and in this District, and have invoked the benefits and protections of the laws of
2 California.

3 7. Venue is proper in this judicial district under 28 U.S.C. §§ 1391 and 1400(b).

4 **FACTS**

5 8. Logitech Europe S.A. and Logitech Inc., under the umbrella of parent corporation
6 Logitech International S.A., are global leaders in providing accessories and peripheral products
7 for computers and other electronic devices. Since at least 1981, Logitech has been involved in
8 the design, development, and manufacture of computer mice, and is internationally renowned for
9 its innovative and cutting-edge computer mouse products.

10 9. Logitech's patented inventions for computer mice provide many advantages,
11 including making the mice more responsive, durable, ergonomic, aesthetically appealing, and/or
12 cost-effective.

13 10. Upon information and belief, defendant Acrox is a manufacturer of computer
14 peripheral products, including mice. Upon information and belief, Acrox serves as an original
15 equipment manufacturer for a variety of mice, including but not limited to HP X3000 and HP
16 X1000 mice, and other products of the same or similar configurations, products under different
17 names, and variants of these products. Upon information and belief, Acrox imports such mice
18 into the United States, including but not limited to various locations in California such as Los
19 Angeles, Long Beach, and Oakland, for sales to consumers throughout the United States,
20 including in this District.

21 **COUNT ONE**

22 **INFRINGEMENT OF U.S. PATENT NO. 7,030,857**

23 11. Plaintiff incorporates by reference each and every allegation set forth in
24 paragraphs 1 through 10 of this Complaint as if fully set forth and restated herein.

25 12. The '857 patent, titled "Mouse with Integrated Keyplate and Housing," was legally
26 issued by the United States Patent and Trademark Office on April 18, 2006. A true and correct
27 copy of the '857 patent is attached as Exhibit A.

13. Logitech Europe S.A. is the sole and exclusive owner of the right, title, and interest in and to the '857 patent, include the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

14. Upon information and belief, Acrox, without authority or consent of Logitech, has directly infringed and continue to directly infringe, under 35 U.S.C. § 271(a), at least claims 1, 8, 9, 12, 13, 15, 16, 17, and 33 of the '857 patent by making, using, offering to sell, selling, and/or providing or causing to be used in the United States, including in this District, products that infringe the '857 patent, including but not limited to the HP X3000 and HP X1000 mice, and other products of the same or similar configurations, products under different names, and variants of these products.

15. As a result, Acrox's infringement of the '857 patent has caused and continues to cause damages and irreparable harm to Logitech.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Logitech Europe S.A., prays for the following relief and judgment be granted against Defendant Acrox, as follows:

- A. Declaring that Acrox infringed and continues to infringe the '857 patent.
- B. Awarding Logitech its full damages, costs, and attorneys' fees.
- C. Permanently enjoining Acrox from further infringing the '857 patent.
- D. Declaring this case exceptional, and awarding Logitech its attorneys' fees and costs incurred in this action, together with interest, pursuant to 35 U.S.C. § 285.
- E. Granting Logitech such additional and further relief as this Court deems just and equitable.

REQUEST FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38, Logitech demands a trial by jury on all issues so triable.

1 Dated: April 9, 2015

I. NEEL CHATTERJEE
ZHENG (JEN) LIU
RANDY WU
Orrick, Herrington & Sutcliffe LLP

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5 By: /s/ Zheng (Jen) Liu
6 ZHENG (JEN) LIU
7 Attorneys for Plaintiff
8 LOGITECH EUROPE S.A.
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